

## Rumrill, Nancy

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**From:** Rumrill, Nancy  
**Sent:** Wednesday, April 16, 2014 11:49 AM  
**To:** FOIA Exemption 6  
**Subject:** RE: Florence Copper/Curis Resources

Hi David,

You are correct. Our permitting process is independent of the state level process.

Sincerely, Nancy

~~~~~

Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
Engineer, Underground Injection Control  
Ground Water Office (WTR-9)  
US EPA, Region IX  
75 Hawthorne St.  
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Fax (415) 947-3549

-----Original Message-----

**From:** David W Wawrzyniec  
**Sent:** Wednesday, April 16, 2014 8:50 AM  
**To:** Rumrill, Nancy  
**Subject:** Florence Copper/Curis Resources

Hi Nancy,

I know you are swamped and I did not want to interrupt your work day. I was consulting with someone about Curis Resources, and it was indicated to me that the EPA might be holding off on issuing a decision on the UIC permit pending a final resolution of the state permit. I was not sure whether this information was based on fact or speculation.

I am following the company with the assumption that the EPA is processing the UIC according to its own schedule independent of any activities taking place at the state level regarding the Temporary APP.  
Can you confirm that my assumption is correct?

Kind regards,  
David Wawrzyniec

## Rumrill, Nancy

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**From:** Rumrill, Nancy  
**Sent:** Monday, March 17, 2014 1:50 PM  
**To:** FOIA Exemption 6  
**Subject:** RE: Florence UIC Draft Permit

Hi David,

Once the draft permit decision has been made it will be posted to our website. I am still working on the administrative record for the proposed decision. You are on my mailing list, and I will send a copy of the public notice when it's issued.

Please don't hesitate to call me if you have additional questions for me.  
Thanks, Nancy

~~~~~

Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
Engineer, Underground Injection Control  
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-----Original Message-----

From: David W Wawrzyniec FOIA Exemption 6  
Sent: Monday, March 17, 2014 1:08 PM  
To: Rumrill, Nancy  
Subject: Florence UIC Draft Permit

Nancy,

I was just wondering how things were going on the Florence copper UIC draft permit. I have been doing a lot of leg work to keep abreast of what the various parties are doing with regard to permit. Based on that research, it was my understanding that the Rule 106 process wrapped up in early-mid February. I have been monitoring your website and have not seen any updates on the EPA site.

Based on our discussions very early on, I was under the impression that once everything was finalized, that the EPA entered a "deliberative phase" that normally lasted about 10 days. I understand that you are not able to disclose material information such as what the decision is but are you also prohibited from giving a expected date for the decision? I guess at this point, I am mystified by that govern within the EPA as I am much more familiar with the FDA practices where expectations for decision/announcement dates are normally quite transparent.

When the draft permit is issued, can you clarify when it is actually updated on the EPA site? Do you post it and notify the company simultaneously or does the EPA wait until the company has issued a press release to publish on the web site.

If a quick five minute call would be easier, let me know and I will give you a ring.

Kind regards,  
David Wawrzyniec

## Rumrill, Nancy

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**From:** David W Wawrzyniec FOIA Exemption 6  
**Sent:** Tuesday, February 04, 2014 10:30 AM  
**To:** Rumrill, Nancy  
**Subject:** Re: Update on Curis/Florence Copper

Thank you! I am incredibly grateful for your willingness to help me understand the processes.

Kindest regards,

David

On Tue, Feb 4, 2014, at 01:27 PM, Rumrill, Nancy wrote:

> Hi David,

>

> That is correct. The NHPA Section 106 process requires us to seek

> public input prior to finalizing the MOA. This part of the process

> will occur during the public comment period for the draft permit decision.

>

> Nancy

>

> ~~~~~

> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))

> Engineer, Underground Injection Control Ground Water Office (WTR-9)

> US EPA, Region IX

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>

> -----Original Message-----

> From: David W Wawrzyniec FOIA Exemption 6

> Sent: Monday, February 03, 2014 9:36 PM

> To: Rumrill, Nancy

> Subject: Re: Update on Curis/Florence Copper

>

> Hi Nancy,

> I would like to make sure I understand the process, not just for this

> project but for others in the future as well.

>

> I thought I understood the process to be as follows

>

> 1. Draft MOA is sent to consulting parties.

> 2. Consulting parties have a 30 day comment period.

> 3. If comments are received they are considered and incorporated as

> appropriate.

> 4. Consulting parties sign off on MOA. [Note: I assumed that this

> meant that the MOA would need formal signatures on the MOA itself for

> each consulting party.] 5. EPA conducts a final review and deliberation.

> 6. EPA issues a draft UIC permit or denies the UIC permit.

>

> If I read your e-mail correctly, the actual process is as follows:

>

> 1. Draft MOA is sent to consulting parties.

> 2. Consulting parties have a 30 day comment period.

> 3. If comments are received they are considered and incorporated as  
> appropriate.  
> 4. EPA conducts a final review and deliberation.  
> 5. EPA issues a draft UIC permit or denies the UIC permit.  
>  
> It seems that the MOA then actually goes through to review processes:  
> 1 by the consulting parties before the draft permit is issued and a  
> second review period as part of the permit review period. Is that correct?  
> If the draft permit is issued, there would be a public comment period  
> that would cover the entire permit including the treatment plan for  
> the historic preservation issue.  
> At this point the permit just moves through the normal process for  
> comment, comment incorporation, decision to issue final permit or not,  
> and if issued, the normal appeal process begins.  
>  
> I apologize for the length of the e-mail. I hate to impose on your  
> time but I just want to be sure my understanding of the process is correct.  
>  
> If it would be easier to clarify by phone, let me know. I can give you  
> a call.  
>  
> Kind regards,  
> David  
>  
>  
>  
>  
>  
>  
>  
>  
> On Mon, Feb 3, 2014, at 05:25 PM, Rumrill, Nancy wrote:  
>> Hi David,  
>>  
>> We are considering comments on the draft MOA. The work on the  
>> National Historic Preservation Act (NHPA) Section 106 process is  
>> on-going. The final draft MOA will be public noticed with a draft  
>> permit decision. The treatment plan will continue to change as we  
>> get additional information and public input.  
>>  
>> Thanks, Nancy  
>>  
>> ~~~~~  
>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground  
>> Injection Control Ground Water Office (WTR-9)  
>> US EPA, Region IX  
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>> Fax (415) 947-3549  
>>  
>> -----Original Message-----  
>> From: David W Wawrzyniec [FOIA Exemption 6]  
>> Sent: Thursday, January 30, 2014 1:53 PM  
>> To: Rumrill, Nancy  
>> Subject: Re: Update on Curis/Florence Copper  
>>  
>> Hi Nancy,

>>

>> Just a quick followup on the MOA regarding historic preservation. I

>> was wondering whether the MOA had been signed off yet or whether

>> there were comments that came back from the consulting parties. Are

>> you still waiting on final touchups on the treatment plan from Curis Resources?

>>

>> Regards,

>> David

>>

>>

>>

>> On Fri, Jan 3, 2014, at 12:49 PM, Rumrill, Nancy wrote:

>>> Hi David,

>>>

>>> The draft MOA did go out to Consulting Parties before the

>>> Christmas holiday.

>>>

>>> Let me know if you need additional information. Happy New Year,

>>> Nancy

>>>

>>> ~~~~~

>>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground

>>> Injection Control Ground Water Office (WTR-9)

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>>>

>>> -----Original Message-----

>>> From: David W Wawrzyniec FOIA Exemption 6

>>> Sent: Thursday, December 19, 2013 9:10 AM

>>> To: Rumrill, Nancy

>>> Subject: Re: Update on Curis/Florence Copper

>>>

>>> Hi Nancy,

>>>

>>> I just wanted to thank you for taking the time to speak with me

>>> earlier this month. I hope I did not sound terse, but I did not

>>> want to take up too much of your time. I recognize that you have a very busy schedule.

>>>

>>> If the draft MOA has not gone out yet, do you anticipate that it

>>> will go out before year end?

>>>

>>> Merry Christmas and Happy New Year,

>>>

>>> David Wawrzyniec

>>>

>>>

>>> On Tue, Nov 5, 2013, at 01:31 PM, Rumrill, Nancy wrote:

>>>> Hi David,

>>>>

>>>> We still have comments from consulting parties to address. I

>>>> know Florence Copper is working on it. We are expecting to have

>>>> additional information from them this week. I don't have an

>>>> estimate of when the MOA will be finalized.

>>>>

>>>> Sincerely, Nancy

>>>>

>>>> ~~~~~

>>>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground

>>>> Injection Control Ground Water Office (WTR-9)

>>>> US EPA, Region IX

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>>>>

>>>> -----Original Message-----

>>>> From: David W Wawrzyniec FOIA Exemption 6

>>>> Sent: Wednesday, October 30, 2013 8:27 PM

>>>> To: Rumrill, Nancy

>>>> Subject: Re: Update on Curis/Florence Copper

>>>>

>>>> Hi Nancy,

>>>> Hope all is well with you in California these days. I am sure

>>>> the recent shutdown was a bit stressful as well as getting

>>>> everything back up and running at the end of it. I was just

>>>> wondering whether or not the Rule

>>>> 106 preservation process was completed yet or whether you had a

>>>> general idea of when the MOU might be finalized; and or whether

>>>> their were any outstanding issue to resolve on the treatment

>>>> plan from the EPA perspective.

>>>>

>>>> Kind regards,

>>>> David Wawrzyniec

>>>>

>>>> On Mon, Aug 26, 2013, at 01:14 PM, Rumrill, Nancy wrote:

>>>>> Hi David,

>>>>>

>>>>> Not yet.

>>>>>

>>>>> Nancy

>>>>>

>>>>> ~~~~~

>>>>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground

>>>>> Injection Control Ground Water Office (WTR-9)

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>>>>>

>>>>> -----Original Message-----

>>>>> From: David W Wawrzyniec FOIA Exemption 6

>>>>> Sent: Friday, August 23, 2013 3:23 PM

>>>>> To: Rumrill, Nancy

>>>>> Subject: Update on Curis/Florence Copper

>>>>>

>>>>> Hi Nancy,

>>>>>

>>>>> I will be heading back overseas next week for a few months and

>>>>> wanted to followup with you before I headed out. At this

>>>>> point, do you have any further visibility as to when the

> > > > Florence Copper UIC draft permit would be submitted for  
> > > > deliberation and/or update as to whether the Rule 106 process has been completed?  
> > > >  
> > > > Regards,  
> > > > David Wawrzyniec

## Rumrill, Nancy

---

**From:** Rumrill, Nancy  
**Sent:** Wednesday, July 03, 2013 5:14 PM  
**To:** FOIA Exemption 6  
**Subject:** RE: Statistics regarding UIC permit applications and processing

Hi David,

The March 2011 application from Curis Arizona went through an administrative completeness review. The original application was for a Phase 1 Production Test Facility (PTF) and a Phase II Commercial scale project. The application was probably administratively complete in April 2011. In May/June 2012, we received the modified application focusing on the Production Test Facility. We do not consider this prior proposed project or the current proposed PTF a major new UIC injection well; therefore, we do not have a project decision schedule.

Sincerely, Nancy

~~~~~  
Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
Engineer, Underground Injection Control  
Ground Water Office (WTR-9)  
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-----Original Message-----

**From:** David W Wawrzyniec FOIA Exemption 6  
**Sent:** Wednesday, July 03, 2013 3:07 PM  
**To:** Rumrill, Nancy  
**Subject:** Re: Statistics regarding UIC permit applications and processing

Hi Nancy,

Thanks for the update. I have been doing a little bit more reading in the CFR and had come across this from 40 CFR 124.3

(f) The effective date of an application is the date on which the Regional Administrator notifies the applicant that the application is complete as provided in paragraph (c) of this section.

(g) For each application from a major new HWM facility, major new UIC injection well, major NPDES new source, major NPDES new discharger, or a permit to be issued under provisions of § 122.28(c), the Regional Administrator shall, no later than the effective date of the application, prepare and mail to the applicant a project decision schedule. (This paragraph does not apply to PSD permits.) The schedule shall specify target dates by which the Regional Administrator intends

to:

- (1) Prepare a draft permit;
- (2) Give public notice;
- (3) Complete the public comment period, including any public hearing; and
- (4) Issue a final permit.



If there is no expectation for the draft permit, does this mean that the Regional Administrator has never notified the company that the application is complete. In essence, meaning that the RA would not have to commit to a time frame for completion?

Regards,  
David

On Thu, Jul 4, 2013, at 12:19 AM, Rumrill, Nancy wrote:

> Hi David,  
>  
> The technical evaluation of the UIC application continues with the  
> National Historic Preservation process. We have progressed, but I  
> still don't have a reliable prediction of when a draft permit decision will be  
> published.  
>  
> Nancy  
>  
> ~~~~~  
> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
> Engineer, Underground Injection Control Ground Water Office (WTR-9)  
> US EPA, Region IX  
> 75 Hawthorne St.  
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>

> -----Original Message-----

> From: David W Wawrzyniec FOIA Exemption 6  
> Sent: Monday, July 01, 2013 6:51 PM  
> To: Rumrill, Nancy  
> Subject: Re: Statistics regarding UIC permit applications and  
> processing  
>

> Hi Nancy,  
>

> I was just wondering on whether or not you have any visibility yet as  
> to when the deliberation phase might be starting on the UIC permit for  
> the Florence Copper project.  
>

> Regards,  
> David Wawrzyniec  
>

> On Wed, Apr 24, 2013, at 03:37 AM, Rumrill, Nancy wrote:

>> Hi David,  
>>  
>> There is no publicly available database for this information. You  
>> will need to provide a Freedom of Information Request. Please  
>> consider the on-line database at -  
>> [http://www.epa.gov/epafoia1/make\\_a\\_request.html](http://www.epa.gov/epafoia1/make_a_request.html)  
>>  
>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground  
>> Injection Control Ground Water Office (WTR-9)  
>> US EPA, Region IX  
>> 75 Hawthorne St.  
>> San Francisco, CA 94105

> > Phone (415) 972-3293  
> > Fax (415) 947-3549  
> >  
> > -----Original Message-----  
> > From: David W Wawrzyniec [FOIA Exemption 6]  
> > Sent: Monday, April 22, 2013 10:09 PM  
> > To: Rumrill, Nancy  
> > Subject: Statistics regarding UIC permit applications and processing  
> >  
> > Dear Ms. Rumrill,  
> >  
> > I am conducting research into the UIC permit process. Is there a way  
> > to find data on the EPA website that would show the activities in  
> > the UIC program. Specifically, I am looking for the number of  
> > applications that have been submitted over the last 5 to 10 years as  
> > well as the current status, approvals, denials, etc. Is this  
> > information available through the EPA website. I have tried to find  
> > it but have not been successful if it is there.  
> >  
> > Kind regards,  
> > David  
> >  
> >  
>  
>

## Rumrill, Nancy

---

**From:** David W Wawrzyniec [FOIA Exemption 6]  
**Sent:** Friday, May 31, 2013 5:44 PM  
**To:** Rumrill, Nancy  
**Subject:** Re: Information regarding a specific UIC application -Amended e-mail

Nancy,

Thank you for all of your help in responding the my FOIA request. I have reviewed all of the material you have sent and view it as complete. You may consider my FOIA request closed. At your discretion, please send any information you have gathered today, so long as it does not impact your ongoing permitting work.

Thank you again and I hope I was not too great of an imposition on your time.

Kind regards,  
David Wawrzyniec

On Fri, May 31, 2013, at 01:39 AM, Rumrill, Nancy wrote:

> Hi David,  
>  
> Thank you for discussing your request today on the phone. As  
> mentioned, I will review the letters that I have regarding the  
> historic preservation process and provide the information by e-mail relevant to your request.  
> I appreciate the extension on the due date to June 17 for your request.

>  
> Sincerely, Nancy

>  
> ~~~~~  
> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
> Engineer, Underground Injection Control Ground Water Office (WTR-9)  
> US EPA, Region IX  
> 75 Hawthorne St.  
> San Francisco, CA 94105  
> Phone (415) 972-3293  
> Fax (415) 947-3549

>  
> -----Original Message-----

> From: David W Wawrzyniec [FOIA Exemption 6]  
> Sent: Saturday, May 25, 2013 7:11 AM  
> To: Rumrill, Nancy  
> Subject: Fwd: Re: Information regarding a specific UIC application  
> -Amended e-mail

>  
> Hi Nancy, (had to amend to fix some editorial issues)  
>  
> My apologies for the delay in getting back to you. The documentation  
> you provided on the UIC was quite helpful. I would like to request  
> copies of the correspondence regarding the Historical Preservation Act  
> and the Endangered Species Act. It was unclear to me whether this  
> represents a large volume of documentation. I am mainly interested in  
> recent correspondence and/or any documentation that would show me  
> where the permits stands in these two processes. I had spoken with  
> someone at Curis who indicated that there were no major issues to

> address under either of these acts and that the site was well understood.

>

> With regard to the technical review, the information you provided is

> adequate unless there has been any recent correspondence regarding

> further RFIs or responses.

>

> Again with regard to documents, I leave it to your discretion as to

> what you deem relevant.

>

> I have the following questions and I understand that your ability to

> respond may be limited by policies and procedures.

>

> 1. Do you have any further visibility as to when the technical review

> will be complete and when the deliberative process will begin? Based

> on the relatively few issues cited in the February RFI, my perception

> is that the technical review is virtually complete, unless a

> subsequent review has raised more issues..

>

> 2. What is the average length of time required to complete the

> deliberative process?

>

> 3. It is my understanding the project had been fully permitted for

> BHP. Would it be safe to assume that the process for the historical

> preservation issue and the endangered species issue would move move

> fairly quickly or is there some aspect of the process that will take

> some time to close.

>

> 4. (In discussions with the company I have been given the impression

> that the UIC is likely to be issued by late summer. While I recognize

> that your ability to make a definitive statement regarding an expected

> issuance date. Can you comment as to whether that is a reasonable

> expectation?

>

> 5. In our last discussion, you mentioned that this permit was a

> controversial one and this fact does have an impact on the review

> process. I have been given to understand that this additional time to

> complete a review stems from the need to make sure that the review is

> extremely thorough to ensure that all appropriate protections are in

> place and that the UIC permit can withstand intense scrutiny. Is that

> a fair assessment?

>

> 6. I see by the autoreply that you are being impacted by the sequester.

> While I am no under illusions that writing a letter to my particularly

> stupid senators in Texas will have any impact on the sequester issue;

> I will be writing them again to explain to them how the sequester not

> only impacts federal employees unfairly but even results in delays in

> business activities that would actually be generating tax revenue as well.

>

> Again, my apologies for the lateness of my reply. If this puts you in

> a bind on the response deadline, let me know what I can do to

> alleviate that.

>

> Regards,

> David

>

>

>

> On Thu, May 23, 2013, at 11:30 PM, Rumrill, Nancy wrote:

>> Hi David,

>>

>> Please let me know if you need additional information or not as

>> outlined below.

>>

>> Thank you, Nancy

>>

>> ~~~~~

>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground

>> Injection Control Ground Water Office (WTR-9)

>> US EPA, Region IX

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>> San Francisco, CA 94105

>> Phone (415) 972-3293

>> Fax (415) 947-3549

>>

>> -----Original Message-----

>> From: Rumrill, Nancy

>> Sent: Thursday, May 16, 2013 5:45 PM

>> To: FOIA Exemption 6

>> Subject: RE: Information regarding a specific UIC application

>>

>> Hi David,

>>

>> Per our phone conversation on May 8, I am sending the attached

>> letters regarding the pending Underground Injection Control (UIC)

>> permit application for the proposed Florence Copper Project from

>> Curis Resources (Arizona). The 2012 letters document modification

>> of Curis Arizona's March 2011 application to review the UIC

>> application only for the Phase 1 Production Test Facility (PTF).

>> Prior to this modification, I have volumes of technical information

>> that makes up the March 2011 application that applies to both the

>> proposed PTF and a Commercial scale project. I also have additional

>> technical responses from September, 2012, applicable to the proposed

>> PTF that would have to be sent by hard copy or CD, which amounts to approx. 1,000+ pages.

>>

>> Besides this technical information, I also have a number of letters

>> and documents relating to the applicable National Historic

>> Preservation Act review process. The UIC permitting process

>> requires our working through the National Historic Preservation and

>> Endangered Species Act consultation and review processes.

>>

>> Please let me know if the information provided will suffice for your

>> interest in the UIC permitting process. If you need additional

>> information on the technical information or the other federal acts

>> review processes, because of the volume, I would need to discuss

>> with you what specific parts you would like to request. If you have

>> additional questions about the status of our review, please let me know.

>>

>> Thanks, Nancy

>>

>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground

>> Injection Control Ground Water Office (WTR-9)

>> US EPA, Region IX

>> 75 Hawthorne St.

>> San Francisco, CA 94105

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>> Fax (415) 947-3549  
>>  
>>  
>> -----Original Message-----  
>> From: David W Wawrzyniec [FOIA Exemption 6]  
>> Sent: Thursday, May 02, 2013 10:01 PM  
>> To: Rumrill, Nancy  
>> Subject: Information regarding a specific UIC application  
>>  
>> Hi Nancy,  
>>  
>> One of my more specific requests that I would like to submit through  
>> the FOIA website pertains to a pending UIC permit application for  
>> the Florence Copper Project under Curis Resources (Florence,  
>> Arizona). It is my understanding that the original application was  
>> submitted in early  
>> 2011 with an expectation that the permit review would be complete in  
>> 12 to 15 months. It is my understanding that the review resulted in  
>> requests for additional information from the company; the UIC permit  
>> has not yet been approved or denied.  
>>  
>> Could you offer any advice on how or what to request in order to  
>> minimize the effort required by EPA staff to review my request? I am  
>> essentially trying to determine where the UIC is in the review  
>> process and how long it will take for the EPA to issue a decision  
>> and/or what outstanding issues need to be resolved before a decision can be rendered).  
>>  
>> I am trying to obtain information regarding the following with  
>> regard to the UIC permit  
>>  
>> 1. Where is the UIC is in the review process and how long it will  
>> take for the EPA to issue a decision?  
>> 2. What outstanding issues need to be resolved before a decision  
>> can be rendered?  
>> 3. It is my understanding that there was a "round table" discussion  
>> regarding the permit that was held on or about March 11, 2012. I  
>> would like to request a transcript or the minutes that resulted from  
>> that meeting if such exist.  
>> 4. Is the federal budget sequester adversely impacting the  
>> rendering of the UIC permit decision?  
>> 5. If issues were raised in the initial review period, have all of  
>> those issues been resolved or answered.  
>>  
>> As is this is the first time, I am conducting this type of  
>> investigation, I have no idea whether providing this as a list in  
>> the FOIA request is sufficient, or if there is a better way to write  
>> the request or specific documents that I need to request in order to  
>> obtain the desired information; or whether the information I am  
>> seeking is publicly available.  
>>  
>> As a number of my family members have been Federal Employees, I am  
>> fully aware that you and your staff have quite a heavy workload and  
>> my appreciation for your time if you can respond.  
>>  
>> Kind regards,  
>> David Wawrzyniec

>>  
>>  
>>  
>>  
>> On Wed, Apr 24, 2013, at 03:37 AM, Rumrill, Nancy wrote:  
>>> Hi David,  
>>>  
>>> There is no publicly available database for this information. You  
>>> will need to provide a Freedom of Information Request. Please  
>>> consider the on-line database at -  
>>> [http://www.epa.gov/epafoia1/make\\_a\\_request.html](http://www.epa.gov/epafoia1/make_a_request.html)  
>>>  
>>> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground  
>>> Injection Control Ground Water Office (WTR-9)  
>>> US EPA, Region IX  
>>> 75 Hawthorne St.  
>>> San Francisco, CA 94105  
>>> Phone (415) 972-3293  
>>> Fax (415) 947-3549  
>>>  
>>> -----Original Message-----  
>>> From: David W Wawrzyniec [FOIA Exemption 6]  
>>> Sent: Monday, April 22, 2013 10:09 PM  
>>> To: Rumrill, Nancy  
>>> Subject: Statistics regarding UIC permit applications and  
>>> processing  
>>>  
>>> Dear Ms. Rumrill,  
>>>  
>>> I am conducting research into the UIC permit process. Is there a  
>>> way to find data on the EPA website that would show the activities  
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>>> as well as the current status, approvals, denials, etc. Is this  
>>> information available through the EPA website. I have tried to  
>>> find it but have not been successful if it is there.  
>>>  
>>> Kind regards,  
>>> David  
>>>  
>>>  
>>  
>>  
>  
>

## Rumrill, Nancy

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**From:** David W Wawrzyniec [FOIA Exemption 6]  
**Sent:** Friday, May 24, 2013 3:16 PM  
**To:** Rumrill, Nancy  
**Subject:** Re: Information regarding a specific UIC application

Hi Nancy,

My apologies for the delay in getting back to you. The documentation you provided on the UIC was quite helpful. I would like to request copies of the correspondence regarding the Historical Preservation Act and the Endangered Species Act. It was unclear to me whether this represents a large volume of documentation. I am mainly interested in recent correspondence and/or any documentation that would show me where the permits stands in these two processes. I had spoken with someone at Curis who indicated that there were no major issues to address under either of these acts and that the site was well understood.

With regard to the technical review, the information you provided is adequate unless there has been any recent correspondence regarding further RFIs or responses.

Again with regard to documents, I leave it to your discretion as to what you deem relevant.

I have the following questions and I understand that your ability to respond may be limited by policies and procedures.

1. Do you have any further visibility as to when the technical review will be complete and when the deliberative process will begin? Based on the relatively few issues cited in the February RFI, I 2. What is the average length of time required to complete the deliberative process?
3. It is my understanding the project had been fully permitted for BHP. Would it be safe to assume that the process for the historical preservation issue and the endangered species issue would move ct would move fairly quickly or is there some aspect of the process that will take some time to close.
4. (In discussions with the company I have been given the impression that the UIC is likely to be issued by late summer. While I recognize that your ability to make a definitive statement regarding an expected issuance date. Can you comment as to whether that is a reasonable expectation?
5. In our last discussion, you mentioned that this permit was a controversial one and this fact does have an impact on the review process. I have been given to understand that this additional time to complete a review stems from the need to make sure that the review is extremely thorough to ensure that all appropriate protections are in place and that the UIC permit can withstand intense scrutiny.
6. I can't recall if you responded to my question about the sequester in our earlier discussion. Is the sequester negatively impacting the progress of the review? If it is, I am happy to write yet another letter to my senators and representatives to point out yet another negative impact their ineffectiveness is having on the government agencies and hence the businesses that rely on them.

Again, my apologies for the lateness of my reply. If this puts you in a bind on the response deadline, let me know what I can do to alleviate that.

Regards,  
David

On Thu, May 23, 2013, at 11:30 PM, Rumrill, Nancy wrote:

- > Hi David,
- >
- > Please let me know if you need additional information or not as
- > outlined below.



>  
> Thank you, Nancy  
>  
> ~~~~~  
> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
> Engineer, Underground Injection Control Ground Water Office (WTR-9)  
> US EPA, Region IX  
> 75 Hawthorne St.  
> San Francisco, CA 94105  
> Phone (415) 972-3293  
> Fax (415) 947-3549  
>  
> -----Original Message-----  
> From: Rumrill, Nancy  
> Sent: Thursday, May 16, 2013 5:45 PM  
> To: FOIA Exemption 6  
> Subject: RE: Information regarding a specific UIC application  
>  
> Hi David,  
>  
> Per our phone conversation on May 8, I am sending the attached letters  
> regarding the pending Underground Injection Control (UIC) permit  
> application for the proposed Florence Copper Project from Curis  
> Resources (Arizona). The 2012 letters document modification of Curis  
> Arizona's March 2011 application to review the UIC application only  
> for the Phase 1 Production Test Facility (PTF). Prior to this  
> modification, I have volumes of technical information that makes up  
> the March 2011 application that applies to both the proposed PTF and a  
> Commercial scale project. I also have additional technical responses  
> from September, 2012, applicable to the proposed PTF that would have  
> to be sent by hard copy or CD, which amounts to approx. 1,000+ pages.  
>  
> Besides this technical information, I also have a number of letters  
> and documents relating to the applicable National Historic  
> Preservation Act review process. The UIC permitting process requires  
> our working through the National Historic Preservation and Endangered  
> Species Act consultation and review processes.  
>  
> Please let me know if the information provided will suffice for your  
> interest in the UIC permitting process. If you need additional  
> information on the technical information or the other federal acts  
> review processes, because of the volume, I would need to discuss with  
> you what specific parts you would like to request. If you have  
> additional questions about the status of our review, please let me know.  
>  
> Thanks, Nancy  
>  
> Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov))  
> Engineer, Underground Injection Control Ground Water Office (WTR-9)  
> US EPA, Region IX  
> 75 Hawthorne St.  
> San Francisco, CA 94105  
> Phone (415) 972-3293  
> Fax (415) 947-3549  
>  
>  
> -----Original Message-----

> From: David W Wawrzyniec FOIA Exemption 6

> Sent: Thursday, May 02, 2013 10:01 PM

> To: Rumrill, Nancy

> Subject: Information regarding a specific UIC application

>

> Hi Nancy,

>

> One of my more specific requests that I would like to submit through  
> the FOIA website pertains to a pending UIC permit application for the  
> Florence Copper Project under Curis Resources (Florence, Arizona). It  
> is my understanding that the original application was submitted in  
> early

> 2011 with an expectation that the permit review would be complete in  
> 12 to 15 months. It is my understanding that the review resulted in  
> requests for additional information from the company; the UIC permit  
> has not yet been approved or denied.

>

> Could you offer any advice on how or what to request in order to  
> minimize the effort required by EPA staff to review my request? I am  
> essentially trying to determine where the UIC is in the review process  
> and how long it will take for the EPA to issue a decision and/or what  
> outstanding issues need to be resolved before a decision can be rendered).

>

> I am trying to obtain information regarding the following with regard  
> to the UIC permit

>

> 1. Where is the UIC is in the review process and how long it will  
> take for the EPA to issue a decision?

> 2. What outstanding issues need to be resolved before a decision can  
> be rendered?

> 3. It is my understanding that there was a "round table" discussion  
> regarding the permit that was held on or about March 11, 2012. I would  
> like to request a transcript or the minutes that resulted from that  
> meeting if such exist.

> 4. Is the federal budget sequester adversely impacting the rendering  
> of the UIC permit decision?

> 5. If issues were raised in the initial review period, have all of  
> those issues been resolved or answered.

>

> As is this is the first time, I am conducting this type of  
> investigation, I have no idea whether providing this as a list in the  
> FOIA request is sufficient, or if there is a better way to write the  
> request or specific documents that I need to request in order to  
> obtain the desired information; or whether the information I am  
> seeking is publicly available.

>

> As a number of my family members have been Federal Employees, I am  
> fully aware that you and your staff have quite a heavy workload and my  
> appreciation for your time if you can respond.

>

> Kind regards,

> David Wawrzyniec

>

>

>

>

> On Wed, Apr 24, 2013, at 03:37 AM, Rumrill, Nancy wrote:

> > Hi David,  
> >  
> > There is no publicly available database for this information. You  
> > will need to provide a Freedom of Information Request. Please  
> > consider the on-line database at -  
> > [http://www.epa.gov/epafoia1/make\\_a\\_request.html](http://www.epa.gov/epafoia1/make_a_request.html)  
> >  
> > Nancy Rumrill ([rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)) Engineer, Underground  
> > Injection Control Ground Water Office (WTR-9)  
> > US EPA, Region IX  
> > 75 Hawthorne St.  
> > San Francisco, CA 94105  
> > Phone (415) 972-3293  
> > Fax (415) 947-3549  
> >  
> > -----Original Message-----  
> > From: David W Wawrzyniec FOIA Exemption 6  
> > Sent: Monday, April 22, 2013 10:09 PM  
> > To: Rumrill, Nancy  
> > Subject: Statistics regarding UIC permit applications and processing  
> >  
> > Dear Ms. Rumrill,  
> >  
> > I am conducting research into the UIC permit process. Is there a way  
> > to find data on the EPA website that would show the activities in  
> > the UIC program. Specifically, I am looking for the number of  
> > applications that have been submitted over the last 5 to 10 years as  
> > well as the current status, approvals, denials, etc. Is this  
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